UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID STEINER, and) STEINER ASSOCIATES, LLC,)	
Plaintiffs,)	Civil Action No. 21-CV-11181-PBS
v.)	
EBAY INC., et al.,	
Defendants.)	

UNOPPOSED MOTION OF DEFENDANT EBAY INC. FOR LEAVE TO FILE MOTION IN LIMINE TO EXCLUDE EVIDENCE OF SEXUAL ASSAULTS AND TESTIMONY OF EXPERT JACQUELINE M. JOHNSON UNDER SEAL

Defendant eBay, Inc. moves for leave to file under seal its Motion in Limine to Exclude Evidence of Sexual Assaults and Testimony of Expert Jacqueline M. Johnson. eBay's Motion, which eBay anticipates filing on November 20, will discuss and cite deposition testimony regarding the alleged sexual assaults of two individuals by Jim Baugh. To protect the identities of the victims of assaults, eBay seeks leave to (1) redact the victims' names where used in eBay's motion and (2) file under seal pertinent excerpts of the deposition transcripts of the victims and Baugh. See, e.g., Doe v. Trs. of Columbia Univ., 2025 WL 2476304, at *8 (S.D.N.Y. 2025) (noting "the longstanding practice of protecting the anonymity of victims of sexual abuse by sealing, redacting, or pseudonymizing their names").

This motion is filed unopposed and pursuant to Local Rule 7.2. Counsel for eBay emailed counsel for the other parties on November 12 seeking their position on this motion. Counsel for defendants Wendy Jones and Steve Wymer responded on November 13 consenting to the relief requested in this motion. The remaining parties have not responded as of this filing.

WHEREFORE, eBay respectfully requests that the Court allow this motion to permit the filing of its Motion in Limine to Exclude Evidence of Sexual Assaults and Testimony of Expert Jacqueline M. Johnson under seal until further order of the Court.

Dated: November 17, 2025 /s/ Jack W. Pirozzolo

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Counsel for eBay Inc.

CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)

I, Jack. W. Pirozzolo, counsel for eBay, hereby certify that, in accordance with Local Rule

7.1(a)(2), I have conferred with counsel of record and the parties proceeding pro se, who did not

object to this motion or did not respond to an email asking if they objected to this motion.

Dated: November 17, 2025 /s/ Jack W. Pirozzolo

Jack W. Pirozzolo

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2025, this document, filed through the CM/ECF

system, will be sent electronically to the registered participants as identified on the Notice of Elec-

tronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: November 17, 2025 /s/ Ja

/s/ Jack W. Pirozzolo Jack W. Pirozzolo